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BROOKLYN OFFICE

Sam A. Schmidt, Esq.

Of Counsel
Peter Nissman, Esq.

February 16, 2006

Hon. John Gleeson. USDJ
United States Courthouse
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: *United States v. Brenda Mayo*
Cr. 04-43 (JG)
05

Dear Hon. Judge Gleeson:

I am the attorney of defendant, Brenda Mayo. Presently, she is scheduled to be sentenced on March 10, 2006. I am submitting this letter to request that the sentence be postponed to May 5 or 12, 2006.

A very important part of the any sentencing submission in this case, either by defendant or by the United States Department of Probation, is the inclusion of information from the psychological forensic evaluation. Unfortunately, that report has not yet been completed. I have spoken to Sindee Haasenoot, USPO, and she has indicated that she is scheduled to make the initial disclosure of the pre-sentence report but would prefer having an opportunity to review the psychological forensic evaluation before disclosure. Defendant also believes that this is appropriate.

I have also obtained some medical records and hope to obtain other records that will be made available to Ms. Haasenoot to assist in the preparation of the report.

I have left a message with Lee Freedman, Esq., the assistant on this matter to determine if he has any objection to an adjournment of the sentence. Based upon prior conversations, I believe that Mr. Freedman will not oppose this request.

If you Honor requires any additional information, please have chambers contact my office. Thank you for your Honor's consideration.

May 10, 2006 @ 2 PM

Sincerely,

Sam A. Schmidt

s/John Gleeson

cc: Lee Freedman, Esq.
Sindee Haasenoot, USPO

TO: Hon. Roseann B. MacKechnie

FROM: Daniel S. Alter, Esq.

DATE: February 16, 2006

Fax number: (212) 857-8710

Pages, including cover sheet: 10